



August 11, 2020

Ms. Alexandra Dunn  
Assistant Administrator  
Office of Chemical Safety and Pollution Prevention  
Environmental Protection Agency

Via Email: [dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)

Dear Ms. Dunn:

On behalf of the members of the American Seed Trade Association, I am writing to encourage EPA to publish new conditional registration decisions for dicamba for use in Engenia, FeXapan and XtendiMax soybean seed platforms as soon as possible. Dicamba has been used effectively and safely for decades; and thousands of farmers depend on it as a critical part of their weed control and resistance management programs. ASTA's over seven hundred member companies include family-owned, local and regional seed businesses which are already experiencing significant financial strain due to current market conditions. The existing state of regulatory uncertainty is adding to that burden. Any delay in an EPA decision on dicamba beyond the end of August or early September will further jeopardize our members' businesses and could hinder farmers' access to weed-control options for the coming year.

In 2020, farmers planted roughly 55-60 million acres of dicamba tolerant soybeans and cotton. Farmers need products like those listed above and others that can address increasingly challenging weed control and weed resistance issues which cost farmers billions of dollars each year. Local and regional seed companies prepare years in advance to bring seeds to the market. This seed production process includes breeding traits into elite varieties that can perform in different geographies and establishing and paying contracts with growers to produce seed more than a year in advance of marketing. This careful planning by our members is being upended by EPA's regulatory process.

Dicamba tolerant soybean seeds for the 2021 growing season will be harvested soon. Farmers have already begun pre-buying these seeds, a process that will be largely completed by October. It is easy to understand that without the approval from EPA for Engenia, FeXapan and XtendiMax, the value of these seeds will diminish, and our members will suffer drastic economic impacts. Furthermore, without timely action and a longer-term registration, EPA may inadvertently influence the competitive marketplace for soybean seeds. In order to ensure a robust soybean supply in 2021 and to minimize economic impacts on the seed industry during these already challenging times, we urge EPA to align its decision making with the realities of farmers' purchasing timeline.

Sincerely,

Andrew W. LaVigne  
President and CEO